

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST
LITIGATION

Case No. 18-cv-1776 (JRT/JFD)

This Document Relates to:

Quirch Foods, LLC v. Agri Stats, Inc.,
0:23-cv-02872

**STIPULATION FOR CERTAIN
DIRECT ACTION PLAINTIFFS' DISCOVERY DEADLINES**

Defendants and the undersigned Direct Action Plaintiffs¹ (together, the “Parties”) in the above-captioned action (the “Action”), through their respective counsel, hereby stipulate as follows:

WHEREAS, Quirch Foods filed its complaint in the Northern District of Illinois on August 24, 2023;²

WHEREAS, Quirch Foods’ case was transferred into this Action on September 28, 2023 (ECF No. 12), after the October 31, 2022, close of fact discovery (ECF No. 1397) and after the June 16, 2023, deadline for Plaintiffs in this Action to identify and disclose testifying experts pursuant to Fed. R. Civ. P 26(a)(2)(B) and 26(a)(2)(C) (ECF No. 1927); and

¹ Quirch Foods, LLC (f/k/a/ Quirch Foods Co.); Butts Foods, LP (f/k/a Butts Foods, Inc.); and Quirch Louisiana LLC (f/k/a Scariano Brothers, LLC, a/k/a Scariano Wholesale Foods Distribution) (collectively, “Quirch Foods”).

² *Quirch Foods, LLC v. Agri Stats, Inc.*, 1:23-cv-06040, ECF No. 1 (filed N.D. Ill. Aug. 24, 2023).

WHEREAS, the Parties have discussed and agreed for Quirch Foods to complete discovery in time to be subject to the May 31, 2024 summary judgment deadline applicable to the other parties in this Action (ECF No. 1927).

NOW THEREFORE, subject to the Court's approval, the Parties hereby stipulate that Quirch Foods will be subject to the following deadlines for discovery.³

| Event | Proposed Deadline |
|---|--------------------------|
| Commencement of Rolling Production of Documents by Quirch Foods | Oct. 13, 2023 |
| Substantial Completion of Structured-Data Productions by Quirch Foods | Nov. 13, 2023 |
| Plaintiffs' Deadline for Objections and Responses to Initial Rule 36 Requests | Nov. 13, 2023 |
| Substantial Completion of Document Productions by Quirch Foods | Nov. 13, 2023 |
| Deadline for Quirch Foods's Supplemental Expert Disclosures to a previously disclosed Plaintiff expert ⁴ | Nov. 17, 2023 |
| Deadline for Defendants' Response to Quirch Foods's Supplemental Expert Disclosures | Dec. 11, 2023 |

³ For all deadlines after December 11, 2023, Quirch Foods will be subject to the operative Pretrial Scheduling Order (ECF No. 1927).

⁴ Quirch Foods has confirmed they will submit a limited supplement to a previously disclosed expert report, setting forth their respective alleged damages estimates. Defendants' agreement to this schedule—in particular Defendants' commitment to respond to Quirch Foods's expert disclosures in relatively short order—is predicated on that commitment.

Respectfully Submitted,

Dated: October 12, 2023

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